

Firm No. 34560

IN THE CIRCUIT COURT OF COOK COUNTY  
LAW DIVISION

Estate of FATIMA ALQADI, deceased, by )  
MARIA MUNOZ, Special Administrator; )

Plaintiff, )

v. )

No. )

FRANCISCAN ALLIANCE, INC.; )  
EMERGENCY MEDICINE PHYSICIANS )  
OF COOK COUNTY, LLC; ANTHONY )  
MILLARD, M.D.; JOHN WODYNSKI, )  
P.A.; AUNT MARTHA'S YOUTH )  
SERVICES CENTER, INC.; and )  
RICHARD L. JONES, M.D.; )

Defendants, )

and )

GENERAL HOOD, MD INC.; GENERAL )  
HOOD, M.D.; and COLLEEN BEHRENS, )  
R.N.; )

Respondents in Discovery. )

735 ILCS 5/2-622 ATTORNEY'S AFFIDAVIT

I, AARON D. BOEDER, being first dully sworn on oath, due hereby state that I have personal knowledge of the matter set forth in this Affidavit and if called as a witness would competently testify as follows:

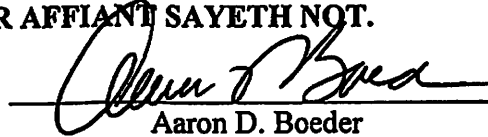
1. I am one of the attorneys for the Plaintiff.
2. I have consulted and reviewed the facts of this case with health professionals who I reasonably believe; (i) are knowledgeable in the relevant issues involved in this particular action; (ii) practice or have practiced within the last six (6) years, or teach or have taught within the last six (6) years in the same area of health care or medicine that are at issue in this particular



action and; (iii) are qualified by experience or demonstrated a competence in the subjects of this case. That the reviewing health professionals have determined in a written report, after a review of the medical records and other relevant medical materials involved in this particular action, that there is a reasonable and meritorious cause for the filing of this action. The affiant has concluded on the basis of the reviewing health professional's review and consultation that there is reasonable and meritorious cause for filing this action.

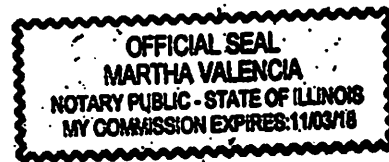
3. The Plaintiff has not previously voluntarily dismissed an action based upon the same or substantially the same facts, omissions or occurrences.

**FURTHER AFFIANT SAYETH NOT.**

  
Aaron D. Boeder

Subscribed and sworn to before me  
this 26<sup>th</sup> day of May, 2016.

  
NOTARY PUBLIC



Aaron D. Boeder (ARDC#6302427)  
SALVI, SCHOSTOK & PRITCHARD, P.C.  
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(Firm No. 34560)

**CERTIFICATE FOR AN ACTION IN MEDICAL MALPRACTICE  
PURSUANT TO 735 ILCS 5/2-622**

I am a physician licensed in the State of New York to practice medicine in all of its branches. I am board certified in obstetrics. I have been in active practice for over thirty years. I am qualified and familiar with the appropriate standard of care for the issues in this case, and I am familiar with the methods, procedures and treatments relevant to the allegations at issue in this case.

I have reviewed in detail the records, facts, and other relevant materials pertaining to the medical care and treatment provided to Maria Munoz and Fatima Alqadi, including medical records from Aunt Martha's and Franciscan St. James Hospital.

For the reasons that follow below, it is my opinion, which I hold to a reasonable degree of medical certainty, that a meritorious basis for filing an action exists against Richard L. Jones, M.D., Anthony Millard, M.D., and John Wodynski, P.A.

**Richard L. Jones, M.D., deviated from the standard of care as follows:**

- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

**Anthony Millard, M.D., deviated from the standard of care as follows:**

- improperly diagnosed Maria Munoz with an allergic reaction to laundry detergent;
- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

**John Wodynski, P.A., deviated from the standard of care as follows:**

- improperly diagnosed Maria Munoz with an allergic reaction to laundry detergent;
- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

It is my opinion, which I hold to a reasonable degree of medical certainty, that the above-referenced deviations caused, or contributed to cause, the stillbirth of Fatima Alqadi.